



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 8/22/2002Time Start 10:00 AMTime Finish 12:00 NOON

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name 3M BRISTOL PACKAGING I.D. Number PAD 000766170Site Address 2201 GREEN LANECounty BUCKS Municipality BRISTOL Zip 19007Name of Inspector ALEX PAGEName & Title of Responsible Official MERIDETH L. CERAR - ENVIR. ENGINEERPerson Interviewed ARLYN POPPIN - ENGR. SPEC. Telephone (610) 778-4036Mailing Address (if different from above) 3M ENV. TECH + SERV. ST. PAUL MINN.Amount of Hazardous Waste Generated per Month: 0 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other PBR: ☐ Neutralization/WWTP ☐ Reclaim Other GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types

3. Hazardous Waste Transporters:

Transporter Name SAFETY KLEEN License Number Transporter Name License Number Transporter Name License Number

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
VARIOUS	<u>FINAL</u> <u>WASTE</u> <u>REMOVAL</u>	<u>SAFETY KLEEN</u>
	<u>BUSINESS</u> <u>IS</u> <u>CLOSING</u>	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name 3M Bristol ID Number PA0 000766160 Date 8/22/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name 3M BRISTOL ID Number PAD 000 766170 Date 8/22/2002
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name 3 M BRISTOL ID Number PAP000766170 Date 8/22/2002
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
X				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
X				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
X				Tanks labeled to accurately identify contents	265a.194		H044
X				Required inspections completed and documented in operating log	265a.195	265.195	H045
X				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
X				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	X			Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3M BRISTOL ID Number PAD 000766170 Date 8/22/2002
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	<input checked="" type="checkbox"/>			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
		<input checked="" type="checkbox"/>		Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
	<input checked="" type="checkbox"/>			Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
		<input checked="" type="checkbox"/>		Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

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INSPECTION REPORT COMMENTS

Date of Inspection 8/22/2002 Identification Number PAD 000766170Company/Facility/Site Name 3M PACKAGING SYSTEMS DIVISION

INSPECTION CONDUCTED BY ALEX PAGE, ARLYN POPPIN,
LEAD ENGINEERING SPECIALIST, MARK GAETZ, ENVIRONMENTAL
SPECIALIST, MIKE CARBIN, ASSOC. WESTON SOLUTIONS, AND
CHRIS DECREE, SAFETY KLEEN PROJECT MANAGER WERE
IN ATTENDANCE.

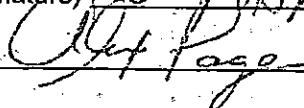
3M CO. BRISTOL OPERATIONS HAVE BEEN MOVED TO
GREENVILLE, SO. CAROLINA.

AT THE HAZARDOUS WASTE STORAGE AREA ALL
HAZARDOUS WASTE CONTAINERS HAVE BEEN REMOVED
WITH THE EXCEPTION OF APPROX. 40 DRUMS
THAT WERE BEING PREPARED FOR SHIPMENT BY
CHRIS DECREE (SAFETY KLEEN). THESE CONTAINERS WERE
SCHEDULED FOR SHIPMENT (8/23) THE NEXT DAY.
THE DOUBLE WALLED PROCESS HAZARDOUS WASTE TANK WAS
REMOVED. THE ENTIRE SITE WAS WALKED AND
EXTENSIVE OPERATIONS WERE UNDERWAY TO INSURE
PROPER HEALTH, SAFETY, AND ENVIRONMENTAL

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Date 8/22/02Inspector (signature) 

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INSPECTION REPORT COMMENTS

Date of Inspection 8/22/2002 Identification Number PA 000766170Company/Facility/Site Name 3M PACKAGING SYSTEMS DIVISION

CLOSURE. SOME BOILER ROOM TESTING REAGENTS
WILL BE LEFT ON SITE SPECIFIC ONLY TO
BOILER ROOM TESTING.

ACCORDING TO ARLYN POPPIN, ALL PROCESS
PIPING, PROCESS EQUIPMENT, AND BOTH ABOVE
GROUND AND UNDERGROUND STORAGE TANKS HAVE
BEEN REMOVED. THE LOGO 3M INERT TANK
WAS CUT UP FOR SCRAP AND REMOVED.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Arlyn PoppinDate 8/22/02Inspector (signature) Chet Page

Inspections

Inspection Id: 1161415 Insp Type: CEI Compliance Evaluation Date Inspected: 08/22/2002

Inspected Entity:

Cat: PF Entity: 1176 PAD000766170 3M BRISTOL PACKAGING SYSTE Program: PAD000766170

Type: CAHWO Captive Haz Kind: Status: ACTIV Active

More SF Sub Fac: 4027 PAD000766170 3M BRISTOL PACKAGING SYSTEM Type: HGCAP

SF Status:

General Insp SF Viol Rel Insp Comp Asst Cover Area Admin P2E2

Owner/Operator: 64811 41-0417775 3M CO

Complaint Id: Inspector: 446831 PAGE, ALEX

Due Date: Inspection Result: NVPSD No violations - permanently shut down

Date Scheduled: Scheduled By:

Agency: DEP PA Dept of Environmental Prote External Joint Insp Viol Ind Compliant Ind

Program: WMHW ICS Code: 4100 SE REGIONAL OFFICE, CONSHOHIO External Details

PE Related Info

County: 09 Bucks Municipality: 09001 Bristol

Create ENF Back Go To



COMMONWEALTH OF PENNSYLVANIA
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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 10/9/2001
Time Start 9:15 AM
Time Finish 12:00 NOON

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name 3M MASKING + PACKAGING DIV. I.D. Number PAD 000766170
Site Address 2201 GREEN LANE
County BUCKS Municipality BRISTOL TOWNSHIP Zip 19007
Name of Inspector ALEX PAGE
Name & Title of Responsible Official STEVE KLEIST. E.H.S. MANAGER
Person Interviewed STEVE KLEIST Telephone (215) 945-2800
Mailing Address (if different from above) SAME
Amount of Hazardous Waste Generated per Month: 20000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name SAFETY KLEEN License Number NJ 08690

Transporter Name S. J. TRANSPORTATION License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D001 D005</u>	<u>WASTE FLAMMABLE LIQUIDS</u>	<u>SAFETY KLEEN</u>
<u>D035</u>		<u>— SMITHFIELD KY</u>
		<u>— LAUREL MD</u>
		<u>— BRIDGEPORT NJ</u>
		<u>— PINEWAD S.C.</u>

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name 3M Co. ID Number PAD 000766170 Date 10/9/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3M CO. ID Number PAD 000766160 Date 10/9/2001
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3M Co. ID Number PAD 000766170 Date 10/9/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
X				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
X				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
X				Tanks labeled to accurately identify contents	265a.194		H044
X				Required inspections completed and documented in operating log	265a.195	265.195	H045
X				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
X				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	X			Special small quantity generator requirements	265a.1	265.201	H048
	↓			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3M Co. ID Number PAP 000 766170 Date 10/9/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
		✓		Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
				Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H0685
	X			Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
		✓		(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
				Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/9/2001 Identification Number PAD 000766170
Company/Facility/Site Name 3M MASKING + PACKAGING SYSTEMS DIVISION
INSPECTION CONDUCTED BY ALEX PAGE, STEVE KLEIST,
EHS MGR, MERIDETH CERAR, ENV. ENGR., ART ADAMS, ASST.
RCRA COORD, BOB EVERLE, ENVIR. ENGR., AND JOE GROTZ
EHS. D.T., WERE THE FACILITY GUIDES. THE 3M CO. TAPE MFG.
DIVISION MANUFACTURES ADHESIVE TAPES USED IN COMMERCIAL
PACKAGING APPLICATIONS. HAZARDOUS WASTES GENERATED
ARE MOSTLY WASTE FLAMMABLE LIQUIDS AND SOME
WASTE CORROSIVE LIQUIDS. BRISTOL 3M FACILITY
EMPLOYS ABOUT 126 PEOPLE.

AT THE HAZARDOUS WASTE STORAGE AREA. ALL
CONTAINERS OF HAZARDOUS WASTE APPEARED TO BE
PROPERLY LABELED AND HAD ACCUMULATION START DATES
LESS THAN THE 90 DAY LIMIT. SPILL CONTAINMENT
TRENCHES WERE CLEAN AND WELL MAINTAINED. A
WEEKLY INSPECTION LOG OF THE HAZARDOUS WASTE
STORAGE ARE WAS AVAILABLE AND APPEARED TO BE
UP TO DATE.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Date 10-9-01

Inspector (signature)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 10/9/2001 Identification Number PAD 000 766170Company/Facility/Site Name 3M CO.

AT A RECORD REVIEW, THE PPC PLAN APPEARED COMPLETE WITH ALL REQUIRED ELEMENTS. EMERGENCY COORDINATOR'S NAMES, ADDRESSES, AND PHONE NUMBERS WERE CHECKED AND FOUND TO BE ACCURATE. TRAINING RECORDS WERE AVAILABLE AND FOUND TO BE WELL ORGANIZED AND COMPETENTLY HANDLED WITH SIGN-IN SHEETS, COURSE DESCRIPTIONS AND TEST MATERIAL + RESULTS. A "NEW" SYSTEM FOR PREPARING MANIFESTS IS NOW IN PLACE WHICH RECTIFIES SOME MINOR DISCREPANCIES AS IDENTIFIED IN THE SPRING OF 2001.

IN GENERAL, THE 3M BRISTOL FACILITY APPEARS CLEAN, NEAT, WELL ORGANIZED AND VERY WELL MANAGED.

3M WILL BE CLOSING DEC 31, 2001. NECESSARY CLEANING AND CLOSURE WILL BE COMPLETED. --
MERIDETH CERAR WILL BE CONTACT PERSON --
AFTER DEC 31 - 651-778-4036

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

Date 10-9-01

Inspector (signature)

Record: 1/1 | :KOSC<DBG> | 438



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/9/2000
Time Start 9:00
Time Finish 12:15

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name 3M MASKING + PACKAGING SYS. DIV. I.D. Number PAD 000766170Site Address 2201 GREEN LANECounty BUCKS Municipality BRISTOL TOWNSHIP Zip 19007Name of Inspector ALEX PAGEName & Title of Responsible Official STEVE KLEIST ENVIR. HEALTH + SAFETY MGR.Person Interviewed STEVE KLEIST Telephone (215) 945-2800Mailing Address (if different from above) SAMEAmount of Hazardous Waste Generated per Month: 20000 Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name SAFETY KLEEN License Number NJ-08690Transporter Name S.J. TRANSPORTATION License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D001, D005</u>	<u>WASTE FLAMMABLE LIQUIDS</u>	<u>SAFETY KLEEN</u>
<u>D035</u>		<u>... VARIOUS LOCATIONS</u>
		<u>SMITHFIELD, KY. 40068</u>
		<u>LAUREL, MD. 20724</u>
		<u>BRIDGEPORT NJ. 08014</u>
		<u>PINEWOOD SC. 29125</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name 3 M CO. ID Number PAD 000766 170 Date 11/9/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3 M Co. ID Number PAD 000766190 Date 11/9/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3 M CO. ID Number PAD 000766170 Date 11/9/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
X				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
X				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
X				Tanks labeled to accurately identify contents	265a.194		H044
X				Required inspections completed and documented in operating log	265a.195	265.195	H045
X				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
X				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	X			Special small quantity generator requirements	265a.1	265.201	H048
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	X			Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3M CO. ID Number PAD 000766170 Date 11/9/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	<input checked="" type="checkbox"/>			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	<input checked="" type="checkbox"/>			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H0685
	<input checked="" type="checkbox"/>			Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
	<input checked="" type="checkbox"/>			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/9/2000 Identification Number PAD 000766170Company/Facility/Site Name 3M MASKING AND PACKAGING SYSTEMS DIVISION

INSPECTION CONDUCTED BY ALEX PAGE. STEVE KLEIST,
E.H.S. MANAGER, ART ADAMS, ASST. RCRA COORD., BOB EVERLE,
ENVIR. ENGR., AND GARY DONAGHY, ENVIR. DESIGNER, WERE
THE FACILITY GUIDES. THE 3M COMPANY TAPE MFG. DIVISION
MANUFACTURES ADHESIVE TAPES USED IN COMMERCIAL PACKAGING
APPLICATIONS. HAZARDOUS WASTES GENERATED ARE MOSTLY
WASTE FLAMMABLE LIQUIDS. THE BRISTOL 3M FACILITY
EMPLOYS APPROXIMATELY 160 PEOPLE.

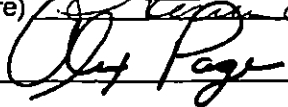
A WALKING INSPECTION OF THE ENTIRE YARD AREA AT
THE BRISTOL 3M PLANT WAS COMPLETED. THE YARD WAS
CLEAN AND WELL ORGANIZED AND NO HAZARDOUS WASTE
CONTAINERS WERE OBSERVED IN THE OUTSIDE YARD AREA.

AT THE HAZARDOUS WASTE STORAGE AREA (INSIDE A SPECIALLY
DESIGNED WAREHOUSE) ALL CONTAINERS OF HAZARDOUS WASTE
APPEARED TO BE PROPERLY LABELED AND HAD ACCUMULATION
START DATES LESS THAN THE 90 DAY LIMIT. SPILL CONTAINMENT
TRENCHES WERE OBSERVED TO BE WELL DESIGNED AND

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Date 11-9-00Inspector (signature) 

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/9/2000 Identification Number PAD 000766170Company/Facility/Site Name 3M CO.

PROPERLY MAINTAINED. A WEEKLY INSPECTION^{LOG} OF THE
HAZARDOUS WASTE STORAGE AREA WAS AVAILABLE AND
INSPECTIONS WERE UP TO DATE.

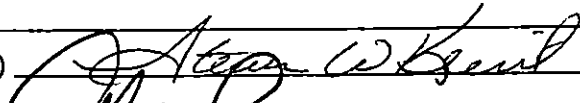

AT A RECORDS REVIEW, MANIFESTS OF HAZARDOUS
WASTE WERE AVAILABLE AND APPEARED PROPERLY COMPLETED,
ROUTED WITHIN TIME LIMITS, AND WITH LAND BAN
DOCUMENTATION ATTACHED. THE P.P.C. PLAN APPEARED
COMPLETE WITH ALL REQUIRED ELEMENTS. DUE TO
PERSONNEL CHANGES AND TANK USE CHANGES, SOME
MINOR ADJUSTMENTS ARE NEEDED. TRAINING RECORDS
FOR THOSE EMPLOYEES DEALING WITH HAZARDOUS WASTE
WERE AVAILABLE ALONG WITH TRAINING COURSE
DESCRIPTIONS AND SIGN-IN SHEETS. IN GENERAL,
THE 3M BRISTOL FACILITY APPEARS CLEAN, NEAT,
WELL ORGANIZED, AND VERY WELL MANAGED.
NO VIOLATIONS OBSERVED.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)


Date 11-9-00

Inspector (signature)

DATE RECEIVED BY TRANSFEREE

Compliance Evaluation

Date Inspected 11/09/2000

PAD000766170

Active

SF
Station

STATUS

Go To

Record: 1/1

<OSC> <DBG>



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 12/7/99
Time Start 10:00 AM
Time Finish 12:00 Noon

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name 3M TAPE MANUFACTURING DIV. I.D. Number PAD 000766170
Site Address 2201 GREEN LANE BRISTOL, PA.
County BUCKS Municipality BRISTOL TOWNSHIP Zip 19007
Name of Inspector ALEX PAGE
Name & Title of Responsible Official STEVE KLEIST ENVIR. MANAGER
Person Interviewed STEVE KLEIST Telephone (215) 945-2800
Mailing Address (if different from above) SAME
Amount of Hazardous Waste Generated per Month: 20,000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name SAFETY KLEEN License Number NJ-08690Transporter Name 3M PRIVATE CARRIAGE License Number PA-AH0296

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D001, D005</u>	<u>WASTE FLAMMABLE LIQUIDS</u>	<u>SAFETY KLEEN</u>
		<u>1200 SYLVAN ST.</u>
		<u>LINDEN N.J. 07036</u>
<u>D001, F005</u>	<u>WASTE FLAMMABLE LIQUIDS</u>	<u>3M COTTAGE GROVE</u>
<u>D035</u>		<u>10746 CHEMOLITE RD.</u>
		<u>COTTAGE GROVE, MN</u>
		<u>55016</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name 3M CO. ID Number PAD000766170 Date 12/7/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

				REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1	2	3	4				
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3M Co. ID Number PAD 000766160 Date 12/7/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4				REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3M Co. ID Number PAD 000766170 Date 12/7/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

				REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
1	2	3	4				
				LQG TANKS (Subchapter J)			
X				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
X				Tanks labeled to accurately identify contents	265a.194		H044
X				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
X				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
X				Special small quantity generator requirements	265a.1	265.201	H048
	X						
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3 M CO ID Number PAD 000766170 Date 12/7/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
				Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
	V						
	X			Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
	V			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

COMPANY / SITE NAME 3M Company-Tape Manufacturing Division
IDENTIFICATION NUMBER PAD000766170
DATE OF INSPECTION 12/07/1999

Inspection conducted by Alex Page with Aleta Finney, Michelle Milburn, Gerry Radomski, and Jon Bower, DEP trainees in attendance. Steve Kleist was the facility guide. The 3M Company Tape Manufacturing Division manufactures a wide variety of adhesive tapes used in commercial packaging applications. Manufacturing processes typically involve the mixing of various rubbers, resins, and other chemical components into a solvent, and then, in the case of adhesive tapes, coating the solvent onto a backing, driving off the solvent in an oven, and slitting the finished tape into consumer rolls. Hazardous wastes generated are mostly waste flammable liquids.

The hazardous waste storage area was observed to be very clean and very well organized. Spill containment trenches were observed to be well designed and well maintained. All containers of hazardous waste appeared to be properly labeled with accumulation start dates less than 90 days.

At a records review, manifests were available and appeared properly completed and routed within time limits. The Preparedness, Prevention, and Contingency Plan appeared complete with all required elements. Training records were available and employees who received training in hazardous waste management procedures were listed on a sign in sheet.

The 3M company discharges process wastewater into the Bristol Borough Water and Sewer Authority sewer system. Permit Number BBI-07-S has been obtained for this purpose.

A copy of a recent manifest, chosen at random, is included with this report.
No violations observed.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve as a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) _____

Date _____

Inspector Signature) _____

Date

12/7/99

File name: ThreeM.doc

Page 6 of 10

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No. 42354

2. Page 1 of 3

Information in shaded area not required by Federal law. Minnesota rules require Items H. and I.

3. Generator's Name and Mailing Address

3M Bristol

BR

3M 2201 Green Lane
Bristol, PA 19007-0119

BRIS

4. Generator's Phone (215) 945-2800

Harminia Karp

5. Transporter 1 Company Name

6. US EPA ID Number

A. State Manifest Document Number

MM 7042354

B. State Generator's ID

C. State Transporter's ID PA-AH0296

D. Transporter's Phone 651/733-6100

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

651/458-2147

9. Designated Facility Name and Site Address

10. US EPA ID Number

3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016

MD006172969

11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

15. Waste No.

HM	No	Type	Quantity	Unit Wt/Vol	Waste No.
a. X	37	DM	10386	P	F005 D001 D035
b.	10	DM	2909	P	NONE
c.	4	DF	1112	F	NONE
d.	2	DM	520	P	NONE

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

a.	b.	c.	d.
----	----	----	----

15. Special Handling Instructions and Additional Information

Trailer No: 64244

☒ L.D.R. Notification(s) Attached

Placards Required: FLAMMABLE, DANGEROUS

Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and all applicable state laws and regulations.

If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

R. T. ACKINNELL

Signature

[Signature]

Date

Month Day Year
07 12 1995

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

STEVEN W. CONNORS

Signature

[Signature]

Date

Month Day Year
08 02 1995

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

James Flynn

Signature

[Signature]

Date

Month Day Year
08 04 1995

14:30:18
07/28/99

NOTIFICATION OF WASTE SUBJECT TO LAND DISPOSAL RESTRICTIONS

w4330
Page: 1

Generator Name:

EPA ID:

Manifest Number

3M Bristol

PAD000766170

MN7042354

I hereby certify that all information submitted above and below
and in all associated documents is complete and accurate
to the best of my knowledge and information.

Information was provided by: ☒ using knowledge of the waste
☐ waste analysis data (attached)

Signature

R. S. MCK

Date 7-29-99

Title ENVIRONMENTAL SAFETY

TSD Facility Name: 3M Cottage Grove Center

Pursuant to 40 CFR 268.7(a) I hereby notify the above named facility
that this waste shipment contains a waste(s) that is (are) restricted
under the land disposal restriction contained in either 40 CFR 268
or RCRA Section 3004(d). This shipment contains one or more of the
following wastes which are subject to the listed treatment requirements
and require treatment prior to land disposal according to applicable
treatment standards set forth in 40 CFR 268.subpart D.

13-0037-2720-6 ☐ Wastewater ☒ Nonwastewater

EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids
Subcategory ($\geq 10\%$ TOC)), D035 (Toxic Characteristic for Methyl Ethyl
Ketone), F005

F001-F005 Spent Solvent Waste containing the following solvents:
Methyl Ethyl Ketone, Toluene

UTS Constituents: Methyl Ethyl Ketone, Toluene

13-0024-2311-2 ☐ Wastewater ☒ Nonwastewater

EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0024-3078-6 ☐ Wastewater ☒ Nonwastewater

EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0037-3496-2 ☐ Wastewater ☒ Nonwastewater

EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids
Subcategory ($\geq 10\%$ TOC))



Inspections

Inspection Id 902008 Insp Type CEI Compliance Evaluation Date Inspected 12/07/1999

Inspected Entity

Cat PF Entity 1176 PAD000766170 3M BRISTOL PACKAGING SY Program Specific Id PAD000766170

Type CAHWO Captive Haz Kind Status ACTIV Active

More SF Sub 4027 PAD000766170 3M BRISTOL PACKA Type LOGEN SF Status

General Insp SF Viol Comp Asst Cover Area Admin

Owner/Operator 64811 41-0417775 3M CO

Inspector 446831 PAGE, ALEX More

Due Date Inspection Result NOVIO No Violations Noted

Date Scheduled Scheduled By

Agency DEP PA Dept of Environmental Prote External Joint Insp Viol Ind

Program WMHW ICS Code 4100 SE REGIONAL OFFICE, CONSHOHOCKEN

PF Related Info: County 09 Bucks Municipality 09001 Bristol

Back Go To

Enter Inspection Type

Record: 1/1 List of Values



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 10/27/98
Time Start 9:00
Time Finish 10:30

HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR☐ S Q GENERATORCompany name 3M TAPE MANUFACTURING DIV. I.D. Number PA0 000766170Site Address 2201 GREEN LANE BRISTOL, PACounty BUCKS Municipality BRISTOL TOWNSHIP ZIP 19007Name of Inspector ALEX PAGEName & Title of Responsible Official NEIL HAMMER, SAFETY, HEALTH + ENVIR. MGR.Person Interviewed NEIL HAMMER Telephone (215) 945-2800Mailing Address (if different from above) SAMEAmount of Hazardous Waste Generated per Month: 25,000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name 3M PRIVATE CARRIAGE License Number PA AH0296Transporter Name SAFETY KLEEN License Number NJ 08690

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, F005	WASTE FLAMMABLE LIQUIDS	SAFETY KLEEN
		1200 SYLVAN ST.
		LINDEN, N.J. 07036
D001, F005	WASTE FLAMMABLE LIQUIDS	3M COTTAGE GROVE
D035		10746 CHEMOLITE RD.
		COTTAGE GROVE, MN
		55016

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1 2 3 4

Page 2 of 10

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name 3 M COMPANY ID Number PAD 000766170 Date 10/27/98

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
X				Containers labeled to accurately identify contents	265.173(c)	H030
X				Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X				Proper containment and collection systems in place	265.178(a)-(d)	H033
X				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
X				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
X				Secondary containment provided for tanks (systems) as required	265.193	H041
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
X				Tanks labeled to accurately identify contents	265.194(d)	H043
X				Required inspections completed and documented in operating log	265.195	H044
X				Release reported to Department within 24 hours, unless exempted	265.196	H045
X				Special requirements for ignitable and reactive wastes followed	265.198	H046
X				SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name 3M COMPANY ID Number PA0000766170 Date 10/27/98

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
	X			Containment Buildings (Subchapter T)		
				Building completely enclosed to prevent exposure to the elements	265.521(a)(1)	H048
				Meets special requirements if liquids present	265.521(b)	H049
				Primary barrier free of significant gaps, cracks and deterioration	265.521(d)(1)(i)	H050
				Level of hazardous waste within unit is below containment walls	265.521(d)(1)(ii)	H051
				Tracking of waste out of unit by equipment or personnel prevented	265.521(d)(1)(iii)	H052
				No visible dust emissions at doors, windows, vents, etc.	265.521(d)(1)(iv)	H053
				Professional engineer's certification placed in operating record	265.521(d)(2)	H054
				Required inspections performed and logged in operating record	265.521	H055
						H056
						H057
						H058
						H059
	X			Drip Pads (Subchapter S)		
				Engineer's certification of existing drip pads on file	265.501	H060
				Drip pad meets 265.503 design & operating standards	265.501	H061
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265.501(a)	H062
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265.501(b)	H063
				Drip pads & collection system maintained to prevent deterioration	265.503(c)	H064
				Drip pads & collection systems designed to prevent run off	265.503(d)	H065
				Run-on/run-off control system maintained unless pad protected by a structure	265.503(e)	H066
				Release reporting requirements met	265.503(m)	H067
				Drip pads inspected weekly and after storms when in operation	265.504(b)	H068
						H069
						H070
						H071
						H072
						H073



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 10/27/98 Identification Number PAD 000766170Company/Facility/Site Name 3M COMPANY -- TAPE MANUFACTURING DIV.

INSPECTION CONDUCTED BY ALEX PAGE. NEIL HAMMER, SAFETY, HEALTH AND ENVIRONMENTAL MANAGER, AND BOB MCKINNELL, HAZARDOUS MATERIALS SAFETY COORDINATOR, WERE THE FACILITY GUIDES.

THE 3M COMPANY BRISTOL TAPE MANUFACTURING DIVISION MANUFACTURES A WIDE VARIETY OF ADHESIVE TAPES USED IN COMMERCIAL PACKAGING APPLICATIONS. MANUFACTURING PROCESSES TYPICALLY INVOLVE THE MIXING OF VARIOUS RUBBER, RESIN, AND OTHER CHEMICAL COMPONENTS INTO A SOLVENT, AND THEN, IN THE CASE OF ADHESIVE TAPES, COATING THE SOLUTION ONTO A BACKING, DRIVING OFF THE SOLVENT IN AN OVEN, AND SLITTING THE FINISHED TAPE INTO CONSUMER ROLLS.

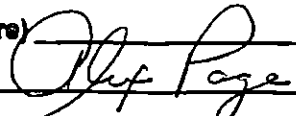
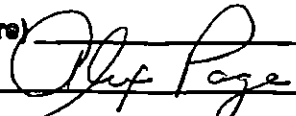
THE HAZARDOUS WASTE STORAGE AREA WAS OBSERVED TO BE VERY CLEAN AND VERY WELL ORGANIZED. ALL CONTAINERS OF HAZARDOUS WASTE APPEARED TO BE PROPERLY LABELED WITH ACCUMULATION START DATES OF LESS THAN 90 DAYS. CONTAINMENT WAS EXCELLENT AND SPILL CONTAINMENT TRENCHES WERE CLEAN.

AT A RECORDS REVIEW, THE PREPAREDNESS,

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)  Date 10/27/98
Inspector (signature)  Date 10/27/98
Page 5 of 10

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 10/27/98 Identification Number PAD 000766170Company/Facility/Site Name 3M COMPANY -- TAPE MANUFACTURING DIV.

PREVENTION, AND CONTINGENCY PLAN APPEARED
COMPLETE WITH ALL THE REQUIRED ELEMENTS.
THE LIST OF EMERGENCY COORDINATORS WAS
DETERMINED TO BE UP-TO-DATE. MANIFESTS
WERE AVAILABLE AND APPEARED PROPERLY ROUTED
AND PROPERLY COMPLETED. A MANIFEST, CHOSEN
AT RANDOM, IS INCLUDED WITH THIS REPORT.

NO VIOLATIONS OBSERVED

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 10/27/98
Inspector (signature) [Signature] Date 10/27/98Page 6 of 10

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

PA0000766170

Manifest
Document No.
310302. Page 1
of 2Information in shaded area not
required by Federal law. Minne-
sota rules require Items H. and I.

3. Generator's Name and Mailing Address

3M 2201 Green Lane
Bristol, PA 19007-0119

3M Bristol

BRIS

A. State Manifest Document Number

MN 7031030

B. State Generator's ID

4. Generator's Phone (215) 945-2800

Herminia Karp

5. Transporter 1 Company Name

3M Private Carriage

6. US EPA ID Number

LND006173082

C. State Transporter's ID PA-AH0296

D. Transporter's Phone 651/736-1042

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

3M Cottage Grove Center
10746 Innovation Road
Cottage Grove, MN 55016

10. US EPA ID Number

LND006172969

H. Facility's Phone

651/458-2147

11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number
and Packing Group)

12. Containers

No

Type

13.
Total
Quantity14.
Unit
Wt/VolI.
Waste No.a. X Waste Flammable Liquid, N.O.S., (METHYL ETHYL
KETONE, TOLUENE, HEPTANE), 3, UN1993, II, (F005,
D001) RQ
3M Profile No. 13-0037-2720-6

41

DM

12305

P

F005 D001
D035

b. Waste Non-Hazardous Caulk

10

DM

3412

P

NONE

c. Waste Non-Hazardous Caulk

1

CF

1848

P

NONE

d. X Waste Aerosols, 2.1, UN1950 Limited Quantity,
(D001) RQ
3M Profile No. 13-0037-3496-2

1

DM

120

P

D001

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

a.
b.
c.
d.a.
b.
c.
d.

15. Special Handling Instructions and Additional Information

Trailer No: 481259

☒ L.D.R. Notification(s) Attached

Placards Required DANGEROUS, FLAMMABLE

CORRECTION BY R.T. MCKINNELL

Carrier has Emergency Response Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name
and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international
and national government regulations and all applicable state laws and regulations.If I am a large quantity generator I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to
be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the
present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste
generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Bob McKinnell

Signature

R.T. McKinnell

Date

Month Day Year
09 09 98

17. Transporter 1 Acknowledgement of Receipt of Materials

Date

Printed/Typed Name

Ken Jennings

Signature

Ken Jennings

Month Day Year
9 11 98

18. Transporter 2 Acknowledgement of Receipt of Materials

Date

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in
Item 19.

Printed/Typed Name

LORAL E. HENRIC

Signature

LORAL E. HENRIC

Date

Month Day Year
09 12 98

**UNIFORM HAZARDOUS
WASTE MANIFEST
(Continuation Sheet)**

21. Generator's US EPA ID No.

PAD000766170

Manifest
Document No.

31030

22. Page

2

Information in the shaded
areas is not required by Federal
law.

23. Generator's Name

3M Bristol
2201 Green Lane
Bristol, PA 19007-0119

L. State Manifest Document Number

PA7031030

M. State Generator's ID

N. State Transporter's ID

O. Transporter's Phone

P. State Transporter's ID

Q. Transporter's Phone

24. Transporter _____ Company Name

25. US EPA ID Number

26. Transporter _____ Company Name

27. US EPA ID Number

28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number
and Packing Group)

29. Containers

30. Total Quantity

31. Unit
Wt/Vol

R. Waste No.

HM			No.	Type	Total Quantity	Unit Wt/Vol	Waste No.
a.		Waste MN-Regulated Resins, Dyes and Oils Profile No. 13-0043-8646-5	1	DM	368	P	NONE MN04
b.	X	Waste Corrosive Liquid, Basic, Inorganic, N.O.S., (SODIUM SILICATE), 8, UN3266, III, (D002) RQ Profile No. 13-0022-4867-5	2	DM	1186	P	D002
c.	X	Waste Corrosive Liquid, Basic, Inorganic, N.O.S., (POTASSIUM HYDROXIDE), 8, UN3266, II, (D002) RQ Profile No. 13-0024-3078-6	2	DF	414	P	D002
d.		Waste Nonregulated Electrical Resin Profile No. 13-0062-8281-1	1	DF	60	P	NONE
e.		Waste Non-Regulated Alumina Trihydrate Profile No. 13-0038-7317-4	1	DF	106	P	NONE
f.		Waste Nonregulated Obsolete Boric Acid Profile No. 13-0062-8087-2	1	DF	67	P	NONE
g.		Waste Non-Regulated Putty Millbase Profile No. 13-0022-3111-9	11	CF	314	P	NONE
h.							
i.							

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

33. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

35. Discrepancy Indication Space

10:16:39
09/01/98

NOTIFICATION OF WASTE SUBJECT TO LAND DISPOSAL RESTRICTIONS

w4330
Page: 1

Generator Name:

EPA ID:

Manifest Number

3M Bristol

PAD000766170

MN7031030

I hereby certify that all information submitted above and below
and in all associated documents is complete and accurate
to the best of my knowledge and information.

Information was provided by: ☒ using knowledge of the waste
☐ waste analysis data (attached)

Signature

R. T. McK

Date 9-9-98

Title ENVIRONMENTAL SAFETY

TSD Facility Name: 3M Cottage Grove Center

Pursuant to 40 CFR 268.7(a) I hereby notify the above named facility
that this waste shipment contains a waste(s) that is (are) restricted
under the land disposal restriction contained in either 40 CFR 268
or RCRA Section 3004(d). This shipment contains one or more of the
following wastes which are subject to the listed treatment requirements
and require treatment prior to land disposal according to applicable
treatment standards set forth in 40 CFR 268.subpart D.

13-0037-2720-6 ☐ Wastewater ☒ Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids
Subcategory ($\geq 10\%$ TOC)), D035 (Toxic Characteristic for Methyl Ethyl
Ketone), F005

F001-F005 Spent Solvent Waste containing the following solvents:
Methyl Ethyl Ketone, Toluene

UTS Constituents: Methyl Ethyl Ketone, Toluene

13-0037-3496-2 ☐ Wastewater ☒ Nonwastewater
EPA Waste Numbers: D001 (High TOC Ignitable Characteristic Liquids
Subcategory ($\geq 10\%$ TOC))

13-0022-4867-5 ☐ Wastewater ☒ Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)

13-0024-3078-6 ☐ Wastewater ☒ Nonwastewater
EPA Waste Numbers: D002 (Corrosive Characteristic Waste)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 2/20/98
Time Start 9:00
Time Finish 11:30

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name 3M COMPANY - TAPE MFG. I.D. Number PAD 000766170

Site Address 2201 GREEN LANE BRISTOL PA.

County BUCKS Municipality BRISTOL TWP. ZIP 19007

Name of Inspector ALEX PAGE

Name & Title of Responsible Official NEIL HAMMER, SAFETY, HEALTH + E. MGR.

Person Interviewed NEIL HAMMER / BOB MCKINNELL Telephone (215) 945-2800

Mailing Address (if different from above) SAME

Amount of Hazardous Waste Generated per Month: 28,500 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name 3M PRIVATE CARRIAGE License Number MND 006173082

Transporter Name SAFETY KLEEN License Number NJDEP 08690

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001 F00	WASTE FLAMMABLE LIQUIDS	SAFETY KLEEN
		1200 SYLVAN ST.
		LINDEN, N.J.
		07036
D001, F005	WASTE FLAMMABLE LIQUIDS	3M COTTAGE GROVE
F005, D035		10746 CHEMOLITE RD.
		COTTAGE GROVE, MN.
		55016

Site Name 3M COMPANY ID Number PAD000766170 Date 2/20/98

LINE

Page 2 of 11

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name 3M COMPANY ID Number PAD000766170 Date 2/20/98

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
X				Containers labeled to accurately identify contents	265.173(c)	H030
X				Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X				Proper containment and collection systems in place	265.178(a)-(d)	H033
X				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
X				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
X				Secondary containment provided for tanks (systems) as required	265.193	H041
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
X				Tanks labeled to accurately identify contents	265.194(d)	H043
X				Required inspections completed and documented in operating log	265.195	H044
X				Release reported to Department within 24 hours, unless exempted	265.196	H045
X				Special requirements for ignitable and reactive wastes followed	265.198	H046
X				SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name 3M COMPANY ID Number PAD 000766170 Date 2/20/98

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENT**CHAPTER CIT.****LINE**

					Containment Buildings (Subchapter T)	
	X				Building completely enclosed to prevent exposure to the elements	265.521(a)(1) H048
					Meets special requirements if liquids present	265.521(b) H049
					Primary barrier free of significant gaps, cracks and deterioration	265.521(d)(1)(i) H050
					Level of hazardous waste within unit is below containment walls	265.521(d)(1)(ii) H051
					Tracking of waste out of unit by equipment or personnel prevented	265.521(d)(1)(iii) H052
					No visible dust emissions at doors, windows, vents, etc.	265.521(d)(1)(iv) H053
					Professional engineer's certification placed in operating record	265.521(d)(2) H054
	V				Required inspections performed and logged in operating record	265.521 H055
						H056
						H057
						H058
						H059
					Drip Pads (Subchapter S)	
	X				Engineer's certification of existing drip pads on file	265.501 H060
					Drip pad meets 265.503 design & operating standards	265.501 H061
					(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265.501(a) H062
					(b) Has synthetic liner below the pad with properly constructed leak detection system	265.501(b) H063
					Drip pads & collection system maintained to prevent deterioration	265.503(c) H064
					Drip pads & collection systems designed to prevent run off	265.503(d) H065
					Run-on/run-off control system maintained unless pad protected by a structure	265.503(e) H066
					Release reporting requirements met	265.503(m) H067
	V				Drip pads inspected weekly and after storms when in operation	265.504(b) H068
						H069
						H070
						H071
						H072
						H073

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 2/20/98 Identification Number PAD 000766170

Company/Facility/Site Name 3M COMPANY

INSPECTION CONDUCTED BY ALEX PAGE, NEIL HAMMER, S.H. AND ENVIR. MANAGER, AND BOB MCKINNELL, HAZ. MAT. SAFETY COORDINATOR WERE THE FACILITY GUIDES. THE 3M BRISTOL PLANT MANUFACTURES A WIDE VARIETY OF PRESSURE SENSITIVE TAPES USED IN PACKAGING AND SOME SPECIALTY ADHESIVES AND CAULKING PRODUCTS. MANUFACTURING PROCESSES TYPICALLY INVOLVE THE MIXING OF VARIOUS RUBBER, RESIN, AND OTHER CHEMICAL COMPONENTS INTO A SOLVENT, AND THEN, IN THE CASE OF TAPES, COATING THE SOLUTION ONTO A BACKING, DRIVING OFF THE SOLVENT IN AN OVEN, AND SLITTING THE FINISHED TAPE INTO CONSUMER ROLLS.

THE HAZARDOUS WASTE STORAGE AREA WAS OBSERVED TO BE VERY CLEAN AND VERY WELL ORGANIZED. ALL CONTAINERS OF HAZARDOUS WASTE APPEARED TO BE COMPLETELY AND PROPERLY LABELED WITH ACCUMULATION START DATES OF LESS THAN 90 DAYS DURATION. CONTAINMENT WAS EXCELLENT AND SPILL CONTAINMENT TRENCHES WITH GRATED COVERS WERE CLEAN.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Inspector (signature) _____

Date _____

Date 2/20/98

Page 5 of 11

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 2/20/98 Identification Number PAD 000766170

Company/Facility/Site Name 3 M COMPANY

AT A RECORDS REVIEW, THE PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN APPEARED COMPLETE WITH ALL THE REQUIRED ELEMENTS. THE LIST OF EMERGENCY COORDINATORS WAS DETERMINED TO BE UP-TO-DATE. MANIFESTS WERE AVAILABLE AND APPEARED PROPERLY ROUTED AND PROPERLY COMPLETED. TWO MANIFESTS, CHOSEN AT RANDOM, ARE INCLUDED WITH THIS REPORT.

NO VIOLATIONS OBSERVED

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature] Date 2/20/98
Inspector (signature) [Signature] Date 2/20/98

Page 6 of 11

State of New Jersey
Department of Environmental Protection
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-97

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PAD 000766170		Manifest Document No. 911715		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address 3M TAPE MFG DIVISION GREEN LANE BRISTOL PA. 19007				6. US EPA ID Number PA 0984908202		A. State Manifest Document Number NJA 2791715		B. State Generator's ID (Gen. Site Address) SOME	
4. Generator's Phone 215-945-2800				7. US EPA ID Number		C. State Trans. ID DAUGER 08879		D. Transporter's Phone 908-862-2000	
5. Transporter 1 Company Name Safety-Kleen Corp				8. US EPA ID Number		E. State Trans. ID DAUGER		F. Transporter's Phone	
7. Transporter 2 Company Name				9. US EPA ID Number		G. State Facility's ID		H. Facility's Phone	
9. Designated Facility Name and Site Address SAFETY KLEEN CORP 1200 SYLVAN STREET LINDEN N.J. 07036				10. US EPA ID Number NJD 002182397		12. Containers		13. Total Quantity	
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group)				14. Unit Wt/Vol		15. Waste No.			
a. X RO WASTE FLAMMABLE LIQUIDS, N.O.S. (ETHANOL AND WATER) 3 UN1993 PG III (D001)(ERG#128)				042 DM		18900 P		D001	
b. X RO WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, HEPTANE, METHYL ETHYL KETONE) 3 UN1993 PG II (F005)(ERG#128)				034 DM		11900 P		F005	
c.									
d.									
J. Additional Descriptions for Materials Listed Above (L,I,)				K. Handling Codes for Wastes Listed Above S02					
a. F003 B001 D035 (L,I,T,S)				b. TOX					
15. Special Handling Instructions and Additional Information EMERGENCY RESP 800-468-1780 (24HR). IF UNDELIVERABLE RETURN TO GENERATOR SK CORP AUTHORIZED TO RETURN THESE SUBSEQUENT CARRIERS: TSMT, HZEC, SHND, NAPT NO. Decal #85656 SKDOT: A: 3032 B: 2103									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name HERMINIA KARP				Signature <i>Hermina Karp</i>		Month Day Year 11/13/97			
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name C.H. Firstbrook				Signature <i>CH Firstbrook</i>		Month Day Year 11/13/97			
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name				Signature		Month Day Year			
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name MARGHERITE COVINO				Signature <i>Margherite Covino</i>		Month Day Year 11/13/97			

NJ 2791715

FOR ACCIDENT AND SPILL EMERGENCIES
CALL CHEMTREC FOR ASSISTANCE 1-800-424-9300

In case of spill or emergency, immediately call the Minnesota Duty Officer (the Minnesota Pollution Control Agency) at 604/424-9300 or 612/649-5451 and the National Response Center at 800/424-9802. Outside Minnesota, call the National Response Center and appropriate state agency.



HAZARDOUS WASTE DIVISION
520 LAFAYETTE ROAD
ST. PAUL, MINNESOTA 55155
ATTN: HWIMS

96-6-1

PLEASE TYPE (Form designed for use on elite (12-pitch) typewriter) or print. Instructions on cover page.

OMB No. 2050-0039
Expires 9/30/96

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. RAD000766170	Manifest Document No. 31022	2. Page 1 of 1	Information in shaded area not required by Federal law. Minnesota rules require Items H, and I.
3. Generator's Name and Mailing Address 3M 2201 Green Lane Bristol, PA 19007-0119			A. State Manifest Document Number MN 7031022		
4. Generator's Phone (215) 945-2800 Herminia Karp			B. State Generator's ID BRIS		
5. Transporter 1 Company Name 3M Private Carriage			C. State Transporter's ID BRIS		
6. US EPA ID Number RAD0006173082			D. State Transporter's Phone 612/456-1042		
7. Transporter 2 Company Name			E. State Transporter's ID		
8. US EPA ID Number			F. Transporter's Phone		
9. Designated Facility Name and Site Address 3M Cottage Grove Center 10746 Chemolite Road Cottage Grove, MN 55016			G. State Facility's ID 136		
10. US EPA ID Number MND006172989			H. Facility's Phone 612/458-2147		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, I.D. Number and Packing Group)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a.	X	Waste Flammable Liquid, N.O.S., (METHYL ETHYL KETONE, TOLUENE, HEPTANE), 3, UN1993.II, (F003, F005) RO 3M Profile No. 13-0069-8834-2	22 IM	7994	P
b.	X	Waste Flammable Liquid, N.O.S., (METHYL ETHYL KETONE, TOLUENE, HEPTANE), 3, UN1993.II, (F005) RO 3M Profile No. 13-0037-2720-6	27 IM	5820	P
c.	X	Waste Flammable Liquid, N.O.S., (METHYL ETHYL KETONE, TOLUENE, HEPTANE), 3, UN1993.II, (D001) RO 3M Profile No. 13-0011-5379-3	13 IM	3066	P
d.		Waste Non-Hazardous Caulk 3M Profile No. 13-0055-5565-4	9 IM	4116	P
J. Additional Descriptions for Materials Listed Above			K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information Placards Required: DANGEROUS, FLAMMABLE			Trailer No: 296586 <input checked="" type="checkbox"/> L.D.R. Notification(s) Attached		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable International and national government regulations and all applicable state laws and regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment, or, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Robert T. McKinney			Signature Robert T. McKinney		Date 08/22/97
17. Transporter 1 Acknowledgement of Receipt of Materials			Date		
Printed/Typed Name Alan R. Johnson			Signature Alan R. Johnson		Month Day Year 8/29/97
18. Transporter 2 Acknowledgement of Receipt of Materials			Date		
Printed/Typed Name			Signature		Month Day Year
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name Lloyd D. Bolin			Signature Lloyd D. Bolin		Date 10/29/97

FORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator's US EPA ID No.
PAD000766170

Manifest Document No.
31022

22. Page
2

Information in the shaded areas is not required by Federal law.

23. Generator's Name
3M Bristol
2201 Green Lane
Bristol, PA 19007-0119

24. Transporter Company Name

25. US EPA ID Number

26. Transporter Company Name

27. US EPA ID Number

28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)				29. Containers		30. Total Quantity	31. Unit Wt/Vol	32. Waste No.
HM				No.	Type			
a.	X	Waste Aerosols, 2.1. UN1950 Limited Quantity. (D001) RO	Profile No. 13-0037-3496-2	2	DM	156	P	D001
b.	X	Hazardous Waste. Solid. N.O.S., (LEAD). 9. NA3077, III. (D008) RO	Profile No. 13-0029-1700-6	1	DM	160	P	D008
c.		Waste Nonregulated Fuel Oil and Absorbent Material	Profile No. 13-0053-2831-4	1	DM	150	P	NONE
d.		Waste Nonregulated Faxwax 116609	Profile No. 13-0094-8578-3	1	DM	184	P	NONE
e.		Waste Nonregulated Resins, Dyes and Oils	Profile No. 13-0043-8646-5	1	DM	272	P	NONE MW4
f.		Waste Nonregulated Light Water	Profile No. 13-0012-9225-2	1	DM	372	P	NONE
g.		Waste Nonregulated Propylene Glycol and Water	Profile No. 13-0075-2053-2	1	DF	221	P	NONE
h.		Waste Nonregulated Fire Barrier Sand	Profile No. 13-0059-5592-0	1	DM	562	P	NONE
i.	X	Waste Corrosive Liquid, Basic. Inorganic, N.O.S., (POTASSIUM HYDROXIDE). 8. UN3266, II, (D002) RO	Profile No. 13-0024-3078-6	1	DF	202	P	NONE

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date
Month Day Year

34. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date
Month Day Year

35. Discrepancy Indication Space

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No.	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal law.
		PAD000766170	31022	3	
23. Generator's Name 3M Bristol 2201 Green Lane Bristol, PA 19007-0119					
24. Transporter Company Name		25. US EPA ID Number			
26. Transporter Company Name		27. US EPA ID Number			
28. US DOT Description (Including Proper Shipping Name, Hazard Class, ID Number and Packing Group)		29. Containers	30. Total Quantity	31. Unit	Hazardous Waste No.
		No. Type		Wt/Vol	
a.	Waste Non-regulated Expantrol Bathhouse Solids Profile No. 13-0034-6602-9	1 IM	578	P	NONE
b.	Waste Non-Regulated Polymer/Water Solution Profile No. 13-0094-5371-6	8 DF	1024	P	NONE
c.	Waste Non-Regulated Aqueous Fire Barrier Solution Profile No. 13-0048-6377-3	4 DF	444	P	NONE
d.	Waste Non-Regulated Graphite Mat Premix Profile No. 13-0019-6338-1	3 DF	78	P	NONE
e.	X Hazardous Waste. Solid. N.O.S.. (LEAD). 9. HAZ077.III. (D008) RO Profile No. 13-0029-1700-6	3 IM	72	P	D008
f.	X Waste Flammable Liquid. N.O.S.. (ISOPROPYL ALCOHOL. BENZENE). 3. UN1993.II. (D001. D018). RO Profile No. 13-0057-6395-1	1 IM	282	P	D001. D018
g.	X RO Waste: Polychlorinated Biphenyls. 9. UN2315.III Profile No. 13-0037-3399-8	1 IM	278	P	NONE
h.					
32. Special Handling Instructions and Additional Information					
7. Transporter 1 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Date	
8. Transporter 2 Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Date	
34. Transporter Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Date	
35. Discrepancy Indication Space					

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 3/12/97 Time start 9:30 Time finish 11:15
Name of Inspector ALEX PAGE
Company, installation name 3M COMPANY - TAPE MFG. DIVISION
Location 2201 GREEN LANE BRISTOL PA. 19007
County BUCKS Municipality BRISTOL TOWNSHIP
Identification number PAD 000766170
Name of responsible official NEIL HAMMER
Title SAFETY, HEALTH, AND ENVIRONMENTAL MANAGER
Mailing Address SAME
Area code and telephone number (215) 945-2800
Name of person interviewed BOB MCKINNELL
Title COORDINATOR, HAZARDOUS MATERIALS SAFETY
Mailing address (if different from above) SAME
Area code and telephone number (215) 945-2800 EXT. 3291

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 8000 LBS kg/mo.
b. 96000 LBS kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D001, D035	3M COTTAGE GROVE	COTTAGE GROVE,
F003, F005	INCINERATOR	MINNESOTA.
AND OTHERS		

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name 3M COMPANY ID Number PAD 000766170 Date 3/12/97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50,.53, .55,.60	H032
X				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3/12/97 Identification Number PAD 000766170
Company/Facility/Site Name 3M COMPANY - TAPE MANUFACTURING DIV.

INSPECTION CONDUCTED BY ALEX PAGE WITH JOHN MITAL, D.E.P. ENVIRONMENTAL TRAINEE, IN ATTENDANCE. BOB MCKINNELL, HAZ-MAT SAFETY COORDINATOR AND NEIL HAMMER, ENVIRONMENTAL MANAGER, WERE THE FACILITY GUIDES.

AT THE HAZARDOUS WASTE STORAGE AREA, DRUMS OF HAZARDOUS WASTE WERE OBSERVED TO BE PROPERLY LABELED AND PLACED IN GOOD CONTAINMENT. A WEEKLY HAZARDOUS WASTE INSPECTION LOG APPEARED COMPLETE AND UP-TO-DATE.

THE 600 GALLON HAZARDOUS WASTE STORAGE TANK NEAR THE ADHESIVE TAPE MANUFACTURING AREA WAS OBSERVED TO HAVE AN OUTER SHELL AS SECONDARY CONTAINMENT.

AT A RECORDS REVIEW, MANIFESTS WERE AVAILABLE AND APPEARED COMPLETE WITH TIMELY ROUTING. THE PPC PLAN WAS REVIEWED AND APPEARED COMPLETE AND UP-TO-DATE.

NO VIOLATIONS OBSERVED

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) 

Date

Inspector (signature) 

Date

3/12/97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 4/4/96 Time start 10:00 Time finish 11:15
Name of Inspector ALEX PAGE
Company, installation name 3M COMPANY - TAPE MFG. DIV.
Location 2201 GREEN LANE BRISTOL PA 19007
County BUCKS Municipality BRISTOL TWP.
Identification number PAD 000766170
Name of responsible official TERRY EASLER
Title PLANT MANAGER
Mailing Address SAME
Area code and telephone number (215) 945-2800
Name of person interviewed BOB MCKINNELL
Title HAZ-MAT SAFETY COORDINATOR
Mailing address (if different from above) SAME
Area code and telephone number SAME

1. Current waste handling method:

- | | | | | |
|-------------------------------------------------|-------------------------------------|-----------------------------------|----------------------------------------------|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 20,000 LBS./kg./mo.
b. 240,000 LBS./kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
D001	SAFETY KLEEN	LINDEN N.J.
F003		
AND OTHERS		

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name 3M COMPANY ID Number PAD 000766170 Date 4/4/96

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
X				Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
X				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years	262.40(a)	H026
X				Quarterly reports submitted to the Department	262.41(a)	H027
X				Exception reporting procedures followed	262.42	H028
X				Hazardous waste disposal plan, if required	262.45	H029
X				Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
X				Special requirements followed for international shipments	262.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 4/4/96 Identification Number PAD 000766170Company/Facility/Site Name 3 M COMPANY - TAPE MFG. DIV.

INSPECTION CONDUCTED BY ALEX PAGE
WITH DINESH RATKOTIA, FACILITIES ENGINEER,
IN ATTENDANCE. BOB Mc KINNELL, HAZ-MAT
SAFETY COORDINATOR, AND STEVE NAPLES, SAFETY
ENGINEER, WERE THE FACILITY GUIDES.
3 M COMPANY IS A MANUFACTURER OF ADHESIVES
AND ADHESIVE TAPE PRODUCTS.

THE HAZARDOUS WASTE STORAGE AREA WAS
OBSERVED TO BE CLEAN AND WELL ORGANIZED.
HAZARDOUS WASTE ACCUMULATIONS WERE WELL
WITHIN THE 90 DAY LIMIT. A WEEKLY IN-HOUSE
INSPECTION LOG APPEARED UP-TO-DATE AND
THOROUGH.

A NEW 600 GALLON HAZARDOUS WASTE STORAGE
TANK WAS RECENTLY INSTALLED AT THE
FACILITY. THE TANK WILL STORE A WASTEWATER
MIXTURE, GENERATED FROM THE SOLVENT RECOVERY
DECANTING SYSTEM. THE TANK USES AN OUTER
SHELL (1/2 SHELL) AS SECONDARY CONTAINMENT.
THE TANK WAS NOT YET IN OPERATION, AND NO
HAZARDOUS WASTE LABELS WERE OBSERVED ON
THE TANK. WHEN IN OPERATION THE NEW TANK
WILL BE USED FOR TYPICAL, LESS THAN 90 DAY
STORAGE OF HAZARDOUS WASTE.

NO VIOLATIONS OBSERVED.

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This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) Alex PageDate 4/4/96

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENTHAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 5/2/95 Time start 10:45 AM Time finish 12:30 PM
 Name of Inspector ALEX PAGE
 Company, installation name 3 M COMPANY
 Location 2201 GREEN LANE BRISTOL PA 19007
 County BUCKS Municipality BRISTOL TWP.
 Identification number PAD 000766170
 Name of responsible official WILLIAM JOHNSON
 Title PLANT MANAGER
 Mailing Address 2201 GREEN LANE BRISTOL PA 19007
 Area code and telephone number (215) 945-2800
 Name of person interviewed BOB MCKINNELL
 Title HAZ-MAT SAFETY COORDINATOR
 Mailing address (if different from above) SAME
 Area code and telephone number SAME

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal, ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal, ☒ INCINERATE
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim FUEL-BLEND

2. Amount of hazardous waste produced:

- a. 20,000 lb. kg/mo.
 b. 240,000 lb. kg/yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>D001, F003</u>	<u>SAFETY KLEEN</u>	<u>LINDEN N.J.</u>
<u>F005, D035</u>		
<u>AND OTHERS</u>		

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B**

Site Name 3 M COMPANY ID Number PA0 000766170 Date 5/2/95

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
X				Hazardous waste determination, performed on all waste streams	262.11
X				Identification number	262.12
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13
X				PA manifest used for intrastate shipments	262.20(b)
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)
X				Manifests filled out properly and completely	262.20(g)
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)
X				Placards offered to transporter	262.33
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)
X				a). All containers of haz. waste in good condition	265.171
X				b). Containers compatible with hazardous waste being stored within	265.172
X				c). Containers of hazardous waste kept closed	265.173(a)
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)
X				f). Haz. waste accumulation areas inspected at least weekly	265.174
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177
X				h). Proper containment and collection system(s)	265.178
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
X				Records retained at designated location for 20 years	262.40(a)
X				Quarterly reports submitted to the Department	262.41(a)
X				Exception reporting procedures followed	262.42
X				Hazardous waste disposal plan, if required	262.45
X				Spill reporting procedures followed	262.46(a)
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)
X				Special requirements followed for international shipments	262.50, .53, .55, .60
X				Source reduction strategy prepared and available by January 7, 1994	262.80

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 5/2/95 Identification Number PAD 000766170
Company/Facility/Site Name 3 M COMPANY

INSPECTION CONDUCTED BY ALEX PAGE, BOB MCKINNELL AND STEVE NAPLES WERE FACILITY GUIDES. 3M IS A MANUFACTURER OF ADHESIVES AND ADHESIVE TAPE PRODUCTS. APPROX. 215 EMPLOYEES WORK AT THE BRISTOL FACILITY. ACCORDING TO BOB MCKINNELL, THERE ARE APPROX. 160 WASTE STREAMS AT THE BRISTOL FACILITY, 2100 OF THEM ARE HAZARDOUS WASTE STREAMS. HAZARDOUS WASTE DETERMINATIONS WERE AVAILABLE FOR ALL WASTE STREAMS. THE HAZARDOUS WASTE STORAGE AREA WAS VERY WELL ORGANIZED AND VERY CLEAN. ALL CONTAINERS OF HAZARDOUS WASTE APPEARED TO BE PROPERLY LABELED. CONTAINMENT WAS EXCELLENT, SPILL CONTAINMENT TROUGHS WERE CLEAN. MANIFESTS WERE AVAILABLE, AND LAND BANS INCLUDED. A SAMPLE MANIFEST, CHOSEN AT RANDOM, IS INCLUDED WITH THIS REPORT.

NO VIOLATIONS OBSERVED

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature) Alex Page Date 5/2/95



State of New Jersey
Department of Environmental Protection and Energy
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PA000766170	Manifest Document No. 67329	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address 3M TAPE MANUFACTURING DIVISION GREEN LANE BRISTOL, PA, 19007 (215)945-2800				A. State Manifest Document Number NJA 1967329	
4. Generator's Phone				B. State Generator's ID (Gen. Site Address) SAME	
5. Transporter 1 Company Name <i>Safety-Kleen Corp</i>				C. State Trans ID (NDEP) 08690	
6. US EPA ID Number <i>JD0984908202</i>				D. Transporter's Phone <i>402 622 2000</i>	
7. Transporter 2 Company Name				E. State Trans ID (NDEP)	
8. US EPA ID Number				F. Transporter's Phone	
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 1200 SYLVAN ST. LINDEN, NJ. 07036				G. State Facility's ID NJD002182897	
10. US EPA ID Number				H. State Facility's Phone 908 362 2000	
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) HM				12. Containers No. Type	
a. X WASTE FLAMMABLE LIQUID, N.O.S. (HEPTANE, TOLUENE, METHYL ETHYL KETONE), 3, UN1993, II, (F003, F005, D001) RQ				061 DM 21350 P	
b. X WASTE FLAMMABLE LIQUID, N.O.S. (ETHYL ALCOHOL, METHANOL), 3, UN1993, II, (D001) RQ				008 DM 03600 P	
c. NOT REGULATED BY USDOT OR USEPA (WASTE NON REGULATED WATER)				007 DM 03150 P	
d.					
13. Additional Descriptions for Materials Listed Above F003, F005, D001, RQ				14. Unit Wt/Vol	
15. Special Handling Instructions and Additional Information 11a. CNT# 0126071-2 (ERGE 27) LAND BAN ATTACHED 24 HOUR EMERG. 11b. CNT# 0204124-9 (ERGE 27) LAND BAN ATTACHED RESPONSE NUMBER 11c. CNT# 0205445-2 CUSTOMER# 60-1318 708-888-4660				16. Waste No.	
18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have taken all steps to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name HERMINIA KARP (FOR 3M COMPANY)				Signature <i>Herminia Karp</i> Month Day Year 03/31/95	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name <i>C.H. Firstbrook</i>				Signature <i>C.H. Firstbrook</i> Month Day Year 03/31/95	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature <i>Susanne</i> Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 18. Printed/Typed Name <i>Vicki Lopez</i> Signature <i>Vicki Lopez</i> Month Day Year 03/31/95					

Lumisized

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ ~~dispose~~
- b. ☐ On-site ☐ use, ☐ reuse, ☐ ~~cycle~~
- c. ☒ Off-site ☐ treatment, ☐ storage, ☒ ~~dispose~~
- d. ☒ Off-site ☐ use, ☐ reuse, ☐ ~~cycle~~

a. 33,670 kg./mo.
b. 404,000 kg./yr.

Waste Number**Destination Facility**

destination: Tech

Location and type).

[illegible]

Hazardous Waste Inspection Report
Generators - Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available <i>TCLP Generator knowledge</i>		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X	X			Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g)
X				Manifests routed properly and within time limits (7 days)		.23(e) or (f)
X				Proper U.S. DOT shipping containers or packages		.30(1)
X				Shipping containers marked and labeled according to U.S. DOT		.30(2)
X				Containers of 110 gal. or less marked with required PA label		.30(3)
X				Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
X				Wastes stored in proper containers and properly marked and labeled		.34(2)
				<i>See next page</i> Containers managed in accordance with 265.171-.177		.34(3)
X				Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
		X		Exception reporting procedures followed		.42
		X		Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented		.46(e)
	X			Special requirements followed for international shipments		50.53.55.60
X				On the job or classroom personnel training program 265.16		.34(a)(5)
X				Drum accumulation area inspected weekly as per 265.174		.34(a)(3)

Hazardous Waste Inspection Report TSD Facilities - Storage (Containers)

1-No Violation Observed				2-Not Applicable				3-Not Determined				4-Non-Compliance			
Status				REQUIREMENT								Chapter Citation			
1	2	3	4									264	265		
X				Containers managed to prevent leaks and spills. /Defective replaced with good containers								171	171		
X				Containers are compatible with waste stored.								171(b)	173(b)		
X				Containers are closed during storage.								172	172(b)		
X				Container storage area inspected weekly for leaks, deterioration, etc.								173(a)	173(a)		
X				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.								174	174		
X				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.								176	176		
X				Satisfactory procedures followed for handling incompatible wastes.								177	177(a)b)		
X				Incompatible wastes separated or protected from other materials.								177(c)	177(c)		
X				Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.								175(a)	178(a)		
X				Containment system has impervious base free of cracks.								175(a)	(1)178(a)		
X				Efficient drainage provided from base to sump or collection system.								175(a)	(2)178(a)		
X				Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.								175(a)	(3)178(a)		
X				Run-on into containment system prevented.								175(b)	178(b)		
X				Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.								175(c)	178(c)		
X				At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.								178	178(d)		
X				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤8 feet high, 8 ft x 8 ft, 5-foot surrounding aisle space).								179(1)	178(e)(1)		
X				Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).								179(2)	178(e)(2)		
X				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.								179(2)	178(e)(2)		
X				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria ≤9 feet high. OR								179(3)	178(e)(3)		
X				Containers labeled to accurately identify hazardous waste contained.								Act 97 Section 6018.403(b)(2)			

Hazardous Waste Inspection Report

Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Citation 40 CFR Part 268
1	2	3	4			
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Generators		
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Dilution not used as a substitute for treatment.		3
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.		7(a)(5), (a)(6)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Storage Facilities		
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Facility verifies generators classification of waste in accordance with waste analysis plan.		25 Pa Code 265.13(c)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Containers marked to identify contents and accumulation date.		50(a)(2)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Notification sent with shipments of wastes that do not meet treatment standards.		7(a)(1)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Notification and certification sent with shipments of wastes meeting treatment standards.		7(a)(2)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Facility maintains records of documents produced pursuant to LDR requirements.		7(a)(6)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Treatment Facilities, including PBR and RRR Facilities		
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Dilution not used as a substitute for treatment.		3
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.		7(b)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Certification and/or notification sent with shipments of waste.		7(b)(4), (b)(5), (b)(6)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Land Disposal Facilities		
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Facility tests wastes received to assure compliance with applicable treatment standards.		7(c)(2)
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Facility land disposes of restricted waste only if it meets applicable treatment standard.		40
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Facility retains copies of generator notifications and certifications.		7(c)(1)

Inspection Report Comments

Date of Inspection 11/10/92 Identification Number PAD 000766170 Facility/Site Name 3M CORPORATION

PERMISSION TO CONDUCT INSPECTION GRANTED BY ARLYN POPPIN + ROBERT MCKINNEL

FACILITY IS A MANUFACTURER OF TAPES, CAULKS, ADHESIVES, ~~WOUND DRESSINGS~~. FACILITY

AREAS WHERE HAZ. WASTE IS PRODUCED INCLUDES, PLASTIC TAPE ROLLING, INDIV. PARTS
WASHING STATIONS, LARGE 200-250 GAL PARTS WASHING STATION, + CEMENT PLANT.

THE HAZARDOUS WASTE DRUM STORAGE AREA WAS INSPECTED.

THE FACILITY SAYS ABOUT A 75% HAZ. WASTE PRODUCTION REDUCTION HAS OCCURRED OVER LAST 2 YEARS

THERE WERE NO VIOLATIONS ~~NOTED~~ OBSERVED DURING THIS INSPECTION.

ADD. NOTE 11/17/92: THE FACILITY REMOVED ABOUT 300 cu yds OF "NON-HAZARDOUS" SOIL
IN LATE SUMMER 1992 FROM A TANK PULL. THE MATERIAL WAS A
HYDRO-CARBON RUBBER RESIN USED IN ADHESIVES AND STORED IN THE
TANK. WASTE PROFILES ARE IN THE REGIONAL + FIELD FILES.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of the Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Cheryl Poppin

Date

11/10/92

Inspector (signature)

Michael J. Hylbachi

Date

11/10/92

Page (5) of 5

Hazardous Waste Inspection Report
Generators - Part ADate of inspection 7/29/91 Time start 12:30 PM Time finish 3:15 PMName of inspector Mike RybackiCompany, installation name 3M Corporation Packaging Systems DivisionLocation Green Lane, P.O. Box 119County Bucks Municipality Bristol TownshipIdentification number PA0 000766 170Name of responsible official Arlyn H. Pappen + Lawrence W. RaganTitle Senior Engineering Specialist Traffic Order Depts. SupervisorMailing address (above)Area code and telephone number (215) 945-2800 Ext. 3127Name of person interviewed (above)Title "Mailing address (if different from above) "Area code and telephone number "

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
- b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- c. ☒ Off-site ☒ treatment? ☐ storage, ☐ disposal
- d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

(incinerate)

2. Amount of hazardous waste produced:

a. 68,167 kg./mo.b. 818,000 kg./yr.

PA AH0296

3. Types of hazardous waste produced by Hazardous Waste: Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
non-pumpable 0001, 0035, F005 0008, 0002	3M Chemdite	PA AH0296 MN0006172969 (612) 458-2141 Bldg 47, 10746 Chemdite Rd. Cottageville, MN 5501
pumpable 0035, F003, F005	M&M Chemical & Equipment Co., Inc.	Hwy 11, North. 1929 Valley Dr. Reece City, AL Attalla, AL 35754

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	
Status				REQUIREMENT			Chapter Citation
1	2	3	4				262
		X		Hazardous waste determination, copies available (TCLP) see comments			.11
X				Identification number			.12(a)
X				Hazardous waste shipments offered only to licensed transporters			.12(d)
		X		Authorization received from TSD facility for wastes shipped off-site see comments			.13
	X			PA manifest used for intrastate shipments			.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments			.20(c)
X				Manifests filled out properly and completely			.20(g), .23(g), (b)
X				Manifests routed properly and within time limits (7 days)			.23(c), (d), (f), (g), (1)
		X		Proper U.S. DOT shipping containers or packages			.30(1)
		X		Shipping containers marked and labeled according to U.S. DOT			.30(2)
X				Containers of 110 gal. or less marked with required PA label			.30(3)
mgp	X	X		Placards offered to transporter			.33
X				Wastes accumulated on-site for less than 90 days			.34(1)
X				Wastes stored in proper containers and properly marked and labeled			.34(2)
		X		Containers managed in accordance with 265.171-.177			.34(3)
X				Containers clearly marked with accumulation date and visible for inspection			.34(4)
X				Records retained at designated location for 20 years			.40
X				Quarterly reports submitted to the Department			.41
X				Exception reporting procedures followed			.42
X				Hazardous waste disposal plan, if required			.45
mgp	X	X		Spill reporting procedures followed			.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented 265.51-.54			.34(a)(5), .46(e)
X				Special requirements followed for international shipments			50.53.55.60
X				On the job or classroom personnel training program 265.16			.34(a)(5)
X				Drum accumulation area inspected weekly as per 265.174			.34(a)(3)
X				Manifests legible (all copies)			.23(h)
X				Tanks managed in accordance with 265.190-.195			.34(a)(2)
X				Preparedness and Prevention as per 265.31-.37			.34(a)(5)
X				Emergency Procedures as per 265.55-.56			.34(a)(5)

Hazardous Waste Inspection Report
TSD Facilities - Storage (Containers)

1—No Violation Observed				2—Not Applicable				3—Not Determined				4—Non-Compliance			
Status				REQUIREMENT								Chapter Citation			
1	2	3	4									265			
X				Containers managed to prevent leaks and spills. /Defective replaced with good containers								.171/.173(b)			
X				Containers are compatible with waste stored.								.172 (b)			
		X		Containers are closed during storage.								.173(a)			
X				Container storage area inspected weekly for leaks, deterioration, etc.								.174			
X				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.								.176			
X				Satisfactory procedures followed for handling incompatible wastes.								.177(a, b)			
X				Incompatible wastes separated or protected from other materials.								.177(c)			
X				Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.								.178(a)			
X				Containment system has impervious base free of cracks.								.178(a) (1)			
X				Efficient drainage provided from base to sump or collection system.								.178(a) (2)			
X				Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.								.178(a) (3)			
X				Run-on into containment system prevented.								.178(b)			
X				Soiled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.								.178(c)			
				At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed. <i>see comments</i>								.178(d)			
X				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤ 6 feet high, 8 ft x 8 ft, 5-foot surrounding aisle space).								.178(e) (1)			
X				Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria (≤ 9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).								.178(e) (2)			
X				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.								.178(e) (2)			
X				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria (≤ 9 feet high).								.178(e) (3)			
				Containers labeled to accurately identify hazardous waste contained.								Act 97 Section 408(b) (2)			

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT	Citation	
1	2	3	4	40 CFR Part 268			
X					Generators		
X					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
X					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
X					Dilution not used as a substitute for treatment.	3	
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
	X				Storage Facilities		
					Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
					Containers marked to identify contents and accumulation date.	50(a)(2)	
					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
					Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
					Treatment Facilities, including PBR and RRR Facilities		
					Dilution not used as a substitute for treatment.	3	
					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
					Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
					Land Disposal Facilities		
					Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
					Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
	✓				Facility retains copies of generator notifications and certifications.	7(c)(1)	

Inspection Report Comments

Date of Inspection

July 29, 1991

Identification Number

PA0 000 766 170

Company/Facility/Site Name

3M Packaging Systems Division ~~PA000~~

Permission to conduct inspection granted by Arlyn Poppen, Orlando Sheets, Lawrence Ragon

Since the last inspection at least two years ago, the facility has reduced their hazardous waste generation by almost 1/2, according to the quarterly reports. The facility is in the process of downsizing their use of solvent based painting even further.

26.11 The facility's coded cone line in the "small pack" department is going through closure. There is a black colored residue in liquid form in a 1/2 full 55-gal drum which is part of the cleanup effluent from this system. The drum was labeled "hazardous waste". Under chapter 265.171-177, containers ~~contain~~ should be kept closed when waste is not being introduced. There was no waste being introduced into this container at the time of this inspection but the lid was not on. Also the lid which was partially on had a ^{1/2} cut taken out, so this lid would not be acceptable for keeping the container closed, if in place.

should

26.11 The facility ~~will~~ send copies of TCLP analytical results to our office of the non-pumpable and pumpable waste streams

26.13 Also, the facility should send our office formal authorizations from the two TSD facilities which accept their waste streams. Also, the facility should send correct part of MN manifest to the MN office of Pollution Control. Facility should correct violations within 4 weeks, after which time a

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements. followup inspection will be performed

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Lawrence W. Ragon

Date

7/29/91

Inspector (signature)

Michael Ryback

Date

7/29/91

Page 5 of 5

Department of Environmental Resources

GEN
EPA

1875 New Hope Street
Norristown, PA 19401
215 270-1948

May 4, 1989

Mr. Walter J. Zoladz
Plant Manager
3M Bristol Packaging Systems Plant
P.O. Box 119
Bristol, PA 19007-0119

Re: Hazardous Waste Inspection
PAD 000 766 170
April 13, 1989
Bristol Township
Bucks County

NOTICE OF VIOLATION

Dear Mr. Zoladz:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

- 75.262.e.7. This facility is mis-classifying the 'non-pumpable' waste as D001 only. It is acceptable to classify the waste as both D001 and F005 at the same time. 3M should perform another waste determination on the non-pumpable waste to determine the proper waste codes.
- 75.265.m.5 The facility does not have a PPC plan. A copy of the facility's SPOC should be forwarded to this office for review. If the SPOC plan meets all of the requirements listed in 75.265.i for a PPC plan, then a PPC plan will not be necessary.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

Mr. Walter J. Zoladz

May 4, 1989

- 2 -

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me 270-1948.

Very truly yours,

ROBERT F. FULTON

Waste Management Specialist

cc: Compliance

Division of Compliance & Monitoring

~~EPA~~

Ms. Kurtz

Re (SIC28)123.15

GEN

EPA

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 4/13/89 Time start 9:30 Time finish 3:00
 Name of inspector ROBERT FULTON
 Company, installation name 3M BRISTOL PACKAGING SYSTEMS PLANT
 Location GREEN LANE, BRISTOL PA 19007
 County BUCKS Municipality BRISTOL TWP
 Identification number PAD 000 766 170
 Name of responsible official WALTER J. ZOLADZ
 Title PLANT MGR.
 Mailing address PO BOX 119, BRISTOL PA 19007-0119
 Area code and telephone number 215-945 2800
 Name of person interviewed ORLANDO SHEETS
 Title RCRA COORDINATOR
 Mailing address (if different from above) SAME
 Area code and telephone number 11

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 1,363,372 kg./mo. YR
 b. 113,614 kg./yr. MO

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>F005</u>	<u>M+M CHEMICAL - EQUIPMENT CO</u>	<u>TSD - INCINERATE</u>
	<u>HWY 11 NORTH (RT 3 BOX 285B)</u>	<u>ALD 070 513 767</u>
	<u>REECE CITY AL 35945</u>	
<u>D001</u>	<u>3M CO - CHEMOLITE</u>	<u>TSD - INCINERATE</u>
	<u>BUDA 47 HWY 61 + GYRD 19</u>	<u>MND 006 172 969</u>
	<u>COTTAGE GROVE MN 55016</u>	

Hazardous Waste Inspection Report
Generators — Part B

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			75.262
X				Hazardous waste determination, copies available <i>NEED TO MAKE NEW DETERMINATION OF NON-PUMPABLE WASTES</i>		(b)
X				Identification number		(c)(1)
X				Hazardous waste shipments offered only to licensed transporters		(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site		(d)
	X			PA manifest used for intrastate shipments		(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		(e)(3)
			X	Manifests filled out properly and completely		(e)(7)
X				Manifests routed properly and within time limits (7 days)		(e)(14) or (15)
X				Proper U.S. DOT shipping containers or packages		(f)(1)(i)
X				Shipping containers marked and labeled according to U.S. DOT		(f)(1)(ii)
	X			Containers of 110 gal. or less marked with required PA label		(f)(1)(iii)
X				Placards offered to transporter		(f)(2)
X				Wastes accumulated on-site for less than 90 days		(g)(1)(i)
X				Wastes stored in proper containers and properly marked and labeled		(g)(1)(ii)
X				Containers managed in accordance with 75.265(q)(1)–(9)		(g)(1)(iii)
X				Containers clearly marked with accumulation date and visible for inspection		(g)(1)(iv)
X				Records retained at designated location for 20 years		(h)
X				Quarterly reports submitted to the Department		(i)
	X			Exception reporting procedures followed		(j)
	X			Hazardous waste disposal plan, if required		(l)
X				Spill reporting procedures followed		(m)(1)
			X	Preparedness, Prevention and Contingency Plan and implemented		(m)(5)
	X			Special requirements followed for international shipments		(o)
X				On the job or classroom personnel training program (75.265(f))		(g)(1)(6)
X				Drum accumulation area inspected weekly as per 75.265(q)(5)		(g)(1)(iii)
			X	LAND BAN NOTIFICATIONS — ON DODI SHIPMENTS		40CFR Sect 268

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 4/13/89 Identification Number PAD 000 766 170
Company, Installation Name 3M BRISTOL PACKAGING SYSTEMS PLANT
County BUCKS Municipality BRISTOL TWP

FACILITY IS MFG OF PRESSURE SENSITIVE TAPE AND SPECIALTY ADHESIVES. THE ADHESIVE IS MADE ~~OF~~ PRIMARILY OF RUBBER, RESINS, AND SOLVENT. WASTE STREAMS FROM THE PRODUCTION OF TAPE AND ADHESIVES ARE OFF-SPEC MATLS AND WASH SOLVENTS. HAZ. WASTES ARE ALSO GENERATED IN DRIP PANS BELOW VALVES. WASTES ARE SEPARATED INTO 2 CATEGORIES; PUMPABLE AND NON-PUMPABLE. THE PUMPABLE WASTES ARE LISTED AS F005 AND CONTAIN HEPTANE, MINERAL SPIRITS, MEK, AND TOLUENE. THE FACILITY GENERATES ABOUT 64,000 KG PER MONTH OF F005 (PUMPABLE) WASTES. THE NON-PUMPABLE WASTES ARE LISTED AS D001. THIS WASTE CONSISTS OF WASH RAGS, GLOVES, BRUSHES, CANS ETC. THAT IS CONTAMINATED W/ THE SAME COMBINATIONS OF HEPTANE, MINERAL SPIRITS, MEK, AND TOLUENE THAT ARE LISTED AS F005 (PUMPABLE ABOVE). THE FACILITY PREVIOUSLY SHIPPED THE NON PUMPABLE AS F005. IN 12/87 ~~IN~~ A DECISION WAS MADE ~~AT~~ THE CORPORATE LEVEL TO CHANGE THE CLASSIFICATION FROM ~~UNCLASSIFIED~~ F005 TO D001. * THE TSD AND METHOD OF DISPOSAL DID NOT CHANGE. THE FACILITY SHOULD DISCONTINUE MANIFESTING NON-PUMPABLE WASTE AS D001 AND CHANGE BACK TO F005 ~~IS~~ LISTING.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

* FACILITY PERSONNEL COULD NOT PROVIDE BASIS FOR CHANGE.

Person Interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 4/13/89 Identification Number PAD 000766170
Company, Installation Name 3M BRISTOL PACKAGING SYSTEMS PLANT
County BUCKS Municipality BRISTOL TWP

WASTES ARE PLACED IN DRUMS AT SATALITE ACCUMULATION AREAS AND POINTS OF GENERATION BY HAND OR BY PUMP. THE DRUMS ARE LABELED AND DATED WHEN WASTE IS FIRST ADDED TO EACH DRUM. WHEN FILLED, THE DRUMS ARE MOVED TO A DRUM STORAGE AREA. THE DRUM STORAGE AREA IS INSIDE. THE FLOOR DRAINS IN THIS AREA LEAD TO A CONTAINMENT STRUCTURE OUTSIDE THE BLDG. IT IS UNLIKELY THAT A SPILL COULD EVEN FLOW TO THIS AREA AS THE WASTE IS QUITE VISCOUS AND DOESN'T MOVE QUICKLY. EACH DRUM IS OPENED AND THE CONTENTS VERIFIED BEFORE RECEIVING A SHIPPING LABEL. THE NON-PUMPABLE WASTE IS SHIPPED DIRECTLY IN DRUMS. THE PUMPABLE WASTE IS PUMPED INTO A TANKER TRUCK. EACH TRUCK HOLDS 96 DRUMS. TRUCKS ARE LOADED IN A CONTAINED LOADING AREA BY PUMPING DRUMS W/ A DEDICATED PUMP + PIPE SYSTEM.

THE FACILITY PREVIOUSLY STORED PUMPABLE WASTES IN A TANK - THIS TANK WAS TAKEN OUT OF SERVICE SOME TIME BEFORE 4/88. A CLEAN UP OF THE ~~STATE~~ SOILS AROUND THE TANK IS ON GOING. THE FACILITY SHOULD KEEP THE DEPT. INFORMED OF THE PROGRESS OF

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 4/13/89 Identification Number PAD 000 766 170
Company, Installation Name 3M BRISTOL PACKAGING SYSTEMS PLANT
County BUCKS Municipality BRISTOL TWP.

THIS CLEAN UP.

I LOCATED 1 MANIFEST W/ WASTE XYLENE
ON IT. XYLENE WOULD BE AN F003 WASTE.
IF THE FACILITY IS GENERATING XYLENE WASTE,
IT SHOULD BE SEGREGATED FROM THE F005
WASTE.

THE FACILITY, DUE TO ITS AGE, ALSO GENERATES
ASBESTOS FROM TIME TO TIME. ^(DUST RENOVATIONS) ASBESTOS
WASTE IS SHIPPED TO THE POTTSTOWN LANDFILL.

IN 11/88 THERE WAS A SHIPMENT OF
555 CU YDS OF CONTAMINATED SOIL. THE SOIL
WAS ~~WAS~~ HAZARDOUS.

THE FACILITY DOES NOT HAVE A PPC PLAN.
THERE IS AN SPEC PLAN ON SITE. A COPY OF
THIS (SPEC) PLAN AND ANY RCCA CONTINGENCY
PLAN SHOULD BE FORWARDED TO THE DEPARTMENT
FOR REVIEW.

RESIDUAL WASTES A SENT TO GROWS LF.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

Date

Inspector (signature)

Date

EPA



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street
Norristown, PA 19401
215 270-1948

March 22, 1988

Minnesota Mining and Manufacturing Company
P.O. Box 119
Bristol, PA 19007

Re: Manifest Review
Manifest Document No. MN0042664
EPA Identification No. PAD000766170

NOTICE OF VIOLATION

Dear General Manager:

This letter is to confirm the findings of the Department's review of the above manifest. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our review are as follows:

75.262(c)(4) - 3M used an unlicensed ("out-of-class") hazardous waste transporter ("3M Private Carriage"). 3M is licensed by the Department only for ignitable (I) Liquids (L) and solids (S), and not for toxic (T) wastes; F005 is listed as an ignitable, toxic waste in the Federal EPA listing regulations.

75.262(e)(1) and 75.262(e)(7)(v) - 3M used the incorrect hazardous waste transporter name on the manifest. The correct name should be "Minnesota Mining and Manufacturing Company", or "3M Company" would be acceptable.

75.262(e)(1) and 75.262(e)(7)(viii) - 3M neglected to enter the "Total Quantity" (Section 13) of pounds on the manifest.

75.262(g)(1)(v) and 75.265(f) - 3M should upgrade its training program, with regard to proper manifesting procedures. This retraining program should include at least Ms. Jean Nicolosi.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a report explaining the reasons for the violations and a proposed program to prevent their reoccurrence. Please indicate with your report documentation that the discrepancies have been resolved.

Minnesota Mining and Manufacturing Company
March 22, 1988

- 2 -

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1948.

Very truly yours,

ROBERT ZANG
Waste Management Specialist

cc: Mr. Danyliw
Mr. Bonner
US EPA/RCRA Enforcement ✓
Division of Compliance & Monitoring
Mr. Tritt
Re 30 (CLC)82.19

EPA



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street
Norristown, PA 19401
215 270-1948

March 22, 1988

General Manager

3M

P.O. Box 119
Bristol, PA 19007

Re: Manifest Review
Manifest Document No. MMI0006441 through
MMI0006447
EPA Identification No. PAD000766170

NOTICE OF VIOLATION

Dear General Manager:

This letter is to confirm the findings of the Department's review of the above manifest. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our review are as follows:

75.262(g)(1)(v) and 75.265(f) - 3M should retrain Ms. Jean Nicolosi in proper manifesting procedures.

75.262(e)(1) and 75.262(e)(7)(viii) - The amounts of hazardous wastes entered in Section 13 ("Total Quantity") were incorrect; "6000 gallons" was entered by you in every case, whereas the range of discrepancies was 145-1066 gallons, all of which are greater than the maximum of 2.0% deviation as stated in subsection 75.265(j)(9)(i) of the Department's Rules and Regulations.

Note: MDN MMI0006448 also lists "6000" as the "Total Quantity". However, the copy received by the Department was not the "Original-Return to Generator" (TSD to generator) copy, but it is the "Generator's Copy", and therefore, no discrepancy is noted in Section 19 of this manifest. Was there also a greater than 2.0% discrepancy with this manifest? The Department hereby requests that you send a legible photocopy of the MDN MMI0006448 "Original-Return to Generator" portion of that manifest to this office for review upon your receipt of this Notice, as required in subsection 75.262(e)(20) of the Department's Rules and Regulations.

75.262(e)(4) - PA manifests should be used, since Alabama does not have an official state manifest.

General Manager

March 22, 1988

- 2 -

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a report explaining the reasons for the violations and a proposed program to prevent their reoccurrence. Please indicate with your report documentation that the discrepancies have been resolved.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at 270-1948.

Very truly yours,

ROBERT ZANG

Waste Management Specialist

cc: Mr. Danyliw

Mr. Bonner

US EPA/RCRA Enforcement ✓
Division of Compliance and Monitoring

Re 30 (CLC)82.18



Official Business
Penalty for Private Use
\$300

FIRST-CLASS MAIL
POSTAGE & FEES PAID
EPA
PERMIT NO. G-35

United States
Environmental Protection
Agency

Washington DC 20460

JOHN A ARMSTEAD
VA/WV SECTION (3HW31)
US EPA REGION III
841 CHESTNUT ST.
PHILADELPHIA, PA 19107

EPA Form 5180-11 (5-79)

B

Hazardous Waste Quantity Notification

Business Name 3M
Business Address GREEN LANE PO BOX 119
BRISTOL PA 19007
EPA ID Number PAD0000766170

Hazardous Waste Generated

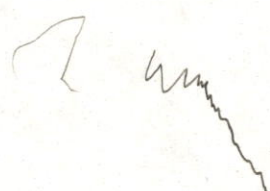
0 - 100 kg/month ☐

100 - 1000 kg/month ☐

1000 kg/month or more ☒
98181

Donell R Maurer - MATERIALS CONTROL MGR

Signature and Title



173 200000

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 270-1948

September 17, 1986

3M Company
P. O. Box 119
Green Lane
Bristol, PA 19007

Attention: E. C. Ritts

Re: 3M Company
PAD000766170
MDN-PAB00660940

Dear Mr. Ritts:

A review of the above referenced manifest revealed that on December 17, 1984, 3M Company offered a shipment of waste flammable liquid (Hazardous Waste No. D001) to Nationwide Carriers for transportation without designating a treatment, storage, or disposal facility to receive it, in violation of 25 PA Code 262(e)(1)(iv).

The violations described above constitute unlawful conduct pursuant to Sections(s) 403(a), 403(b)(5) and 610(4) and (9) of the Pennsylvania Solid Waste Management Act of July 1980 (Act 97), 35 P.S. 6018.101 et seq.

The Department is responsible for enforcement of the Pennsylvania Solid Waste Management Act, including the recovery of monetary civil penalties for violations of Commonwealth law.

To avoid litigation, the Department is willing to resolve this matter by accepting a monetary civil penalty payment for the specific violations described above. We are proposing a settlement on the following basis:

1. By October 10, 1986, 3M Company will pay five hundred dollars (\$500) to the Pennsylvania Solid Waste Abatement Fund by means of a check made payable to the "Commonwealth of Pennsylvania - Solid Waste Abatement Fund."
2. Upon receipt of the above payments and this signed agreement, the Department agrees to forego any further monetary civil penalty enforcement action against 3M Company for the specific violations and dates mentioned above.
3. Notwithstanding the above, nothing in this agreement shall be construed to relieve 3M Company of any liability for unknown effects of violations described herein which may arise or be discovered in the future.

If our settlement proposal is acceptable, please have all copies of this agreement signed and dated on or before October 10, 1986. Two corporate officers must sign (President or Vice President, and Secretary or Treasurer), and the corporate seal must be affixed to each copy. Please return all copies of this agreement and the required penalty payment(s) to our office at the above letterhead address. We will then execute the agreement on behalf of the Department and return an executed copy to you for your records.

Please be notified that after October 10, 1986, this settlement proposal will become void, and we will pursue other enforcement alternatives.

If you have any questions, please contact me.

Very truly yours,

Wayne L. Lynn
WAYNE L. LYNN

WAYNE L. LYNN
Regional Solid Waste Manager

FOR THE DEPARTMENT:

John R. Embick Date
Assistant Counsel
Approved as to Form and Legality

Wayne L. Lynn Date
Regional Solid Waste Manager

FOR 3M COMPANY:

Signature _____ Date _____

Name _____

Title _____

Corporate Seal

Signature _____ Date _____

Name _____

Title

cc: Division of Compliance and Monitoring
Bureau of Litigation
Regional Director
Re 30 (2SWCOA)17

General Offices/3M

3M Center
St. Paul, Minnesota 55144
612/733 1110

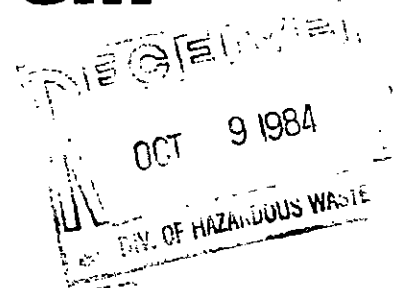
CINDY - CHANGE

CC

3M

October 5, 1984

Penna. Dept. of Environmental Resources
Division of Hazardous Waste Management
Post Office Box 2063
Harrisburg, Pennsylvania 17120



Attention: Mr. Jeffrey A. Beatty - Solid Waste Program Spec.


Gentlemen:

Effective immediately, please remove Marvin L. Rooney as the 3M Bristol site contact. Marv has been transferred to St. Paul and I am the new contact for any correspondence regarding hazardous waste storage and shipment.

3M Bristol's EPA I.D. number is PAD000766170.

Your cooperation is appreciated.

Very truly yours,


Donald R. Maurer
Warehouse Superintendent

cc: Mr. Bruce Beitler
Pa. Dept. of Environmental Resources
Norristown Regional Office

J. Ockeloen - 3M Bristol
R. P. Siegel - 3M St. Paul - 21-2W-05

*Chgd. contact person
2/20/85*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

April 29, 1981

Mr. Jeff Muffar SR.
3M Bristol Packaging Systems Plant
P. O. Box 119
Bristol, Penna. 19007

Re: Facility Name: 3M Bristol Packaging Systems Plant
EPA I. D. Number: PAD 00 076 6170

Dear Mr. Muffar:

Region III of the Environmental Protection Agency (EPA) is currently reviewing the accuracy and completeness of information submitted under the Resource Conservation and Recovery Act (The Act) concerning hazardous waste management activity. EPA has received a Notification of Hazardous Waste Activity (EPA Form 8700-12) for the above facility which indicates that this facility treats, stores or disposes of hazardous waste.

To continue operating after November 19, 1980, all facilities which treat, store or dispose of hazardous waste must have submitted a Part A permit application (EPA Form 3510-1, 3) to EPA by that date. As of this date, EPA has not received a Part A permit application for this facility. If you have determined that this facility does not treat, store or dispose of hazardous waste, please send a letter to that effect within ten days of receipt of this letter. This request is being made pursuant to Section 3007 of the Act, 42 U.S.C. § 6927.

If you have any questions, please contact Joan Henry at the above address or call 215/597-8751.

Sincerely yours,

A handwritten signature in cursive script, reading "Shirley D. Bulkin", is written over the typed name.

Shirley D. Bulkin
Chief, RCRA Administrative Support Section
Permit Enforcement Branch
Enforcement Division



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• PAD000766170

INSTALLATION ADDRESS

3M BRISTOL PACKAGING SYSTEMS PLANT
PO BOX 119
BRISTOL

PA 19007

GREEN LANE
BRISTOL

PA 19007

Environmental Engineering
and Pollution Control/3M

PO Box 33331
St. Paul, Minnesota 55133
612/778 4791

August 14, 1980

copy



Subject: Notification of Hazardous Waste Activity

EPA Region III
P. O. Box 1480
Philadelphia, PA 19107

Dear Sirs:

As required under the Resource Conservation and Recovery Act (RCRA) Section 3010, the attached "Notification of Hazardous Waste Activity," forms have been completed for each 3M Company location within EPA Region III on a divisional manufacturing basis. However, since we have several different divisional manufacturing plants at some locations, you may find more than one notification form per location. This divisional separation is for simplification of 3M internal record keeping. It is requested, however, that a single EPA identification code be assigned for each location.

As of this submittal, 3M is not certain that all of the indicated manufacturing divisions are engaged in Treatment, Storage or Disposal (T S D) activity. The attached notification forms are being submitted as a matter of prudence and are not to be considered an admission of T S D facility activity under the provisions of the Resource Conservation and Recovery Act.

3M will complete our evaluation of all locations/manufacturing divisions before November 19, 1980. Interim facility permit applications will then be submitted for those facilities meeting the T S D facility criteria.

Those locations receiving notification packages are indicated with the EPA assigned identification code.

The following 3M locations within EPA Region III are involved in the generation of hazardous waste.

5/7- Mr. Muffar called - original ltr was in Md.
fac. file folder. Will make change based on
this ltr. J.

Region III

EPA I.D. #

Maryland-3M Gaithersburg, Mincom
3M Westminster, National Ad

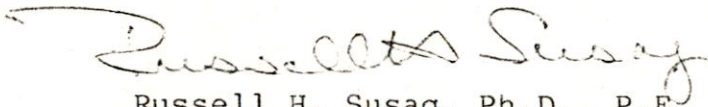
Pennsylvania-3M Bristol, Packaging Systems

Virginia-3M Alexandria, Dynacolor

West Virginia-3M Middleway, Printing Products WVD003095536

Any questions or comments regarding this notification should
be directed to the indicated installation contact.

Sincerely,



Russell H. Susag, Ph.D., P.E.
Director, Environmental Operations
Building 21-2W-06

RHS/cel

Attachment: Notification forms

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITYINSTALLATION'S EPA
I.D. NO.NAME OF IN-
STALLATIONII. INSTALLA-
TION
MAILING
ADDRESS

PLEASE PLACE LABEL IN THIS SPACE

III. LOCATION
OF INSTAL-
LATION

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

RECEIVED
RCRA SECTION
EPA REGION III

Aug 18 0000287

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

FPA000076617021

A

800818

I. NAME OF INSTALLATION

3M BRISTOL PACKAGING SYSTEMS PLANT

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 P.O. BOX 119

CITY OR TOWN

ST.

ZIP CODE

BRISTOL

PA 19007

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 GREEN LANE

CITY OR TOWN

ST.

ZIP CODE

6 BRISTOL

PA 19007

IV. INSTALLATION CONTACT

DONALD R. MAURE (NAME AND TITLE (last, first, & job title) WAREHOUSE SUPT.

PHONE NO. (area code & no.)

2 MUEFAT JEFF - SR. ENVIRON. ENGR.

612-778-4450

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 3M COMPANY

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 2 23 - 26	2 F 0 0 5 23 - 26	3	4	5	6
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME & OFFICIAL TITLE (type or print)

DATE SIGNED

Jeffrey C. Muffat
Sr. Environmental Engineer

8/15/80